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February 10, 2000

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ex Parte Submission

Magalie Roman Salas, Esq.
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554


Re: *Application of SBC Communications Inc. Pursuant to Section 271 of the
Telecommunications Act of 1996 to Provide In-Region, InterLATA
Services in Texas, CC Docket No. 00-4*

Dear Ms. Salas:

Enclosed for filing please find an original and one copy of a document entitled "Additional Clarification on the 'Notes for Page 2' Section of SWBT's UNE-P Migration Process Document." This is a further explanation of the flow chart entitled "SWBT UNE-P Migration Order Process: SWBT Retail/Resale to UNE-P," which was filed with the Commission on February 9, 2000. This additional information focuses on the so-called "three order process" employed by SWBT to process UNE-P conversions reliably and efficiently. It is being provided at the direct request of Commission Staff.

Please let me know if you have any questions about this matter.

Sincerely,


Austin C. Schlick

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Magalie Roman Salas

February 9, 2000

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cc: Mr. Stanley
Ms. Stephens
Ms. Wright
Ms. Farroba, Texas PUC
Ms. Heisler, DOJ
ITS

Additional Clarification on the "Notes for Page 2" Section of SWBT's UNE-P Migration Process Document

1. As depicted on page 2 of the "SWBT UNE-P Migration Order Process" chart, SOAC essentially functions as a "traffic cop," forwarding service orders to downstream systems at the appropriate time and in the appropriate order. SOAC routes service orders to the appropriate downstream systems (LFACS, SWITCH, etc.) for determination as to whether facilities assignments (and/or dispatch to the customer premise) are necessary.
2. The downstream system flow described in steps 1-8 in the "Notes for Page 2" is the flow for all UNE-P orders, whether migrations or new connects. All C and D orders will process through these steps. However, in the case of a UNE-P migration where the address on the C and D orders is the same (as described in more detail below), the downstream systems will simply validate that reuse of facilities is requested, and that no facilities assignment/workforce dispatch is necessary.
3. Similarly, steps 9 – 12 only come into play when central office work (FOMS/FUSA) or dispatch to the customer premise (WFA/DO) is required. These steps are not necessary when facilities are reused on a UNE-P migration.
4. On a UNE-P migration, the D and C orders are related using the Reuse Related Service Order (RRSO) FID. The RRSO FID is automatically populated by MOG on MOG-eligible orders. On non-MOG-eligible orders, the RRSO FID is typed by the LSC service representative. The CLEC is not responsible for including the RRSO FID on its LSRs.
5. The RRSO FID instructs downstream systems that the D and C service orders are to be processed together, and that the facilities specified on the D order are to be reused for provisioning the C order. In order for this reuse of facilities to take place, the service addresses on the D and C orders must be the same. If the addresses are different, SWBT's systems have no way of knowing that the CLEC desires that the same facilities already in use when the D order is issued are to be reused at the same address to complete the C order.
6. The address on the 'C' order is populated from the service address information provided by the CLEC on its LSR. The address on the 'D' order is populated from the current customer address contained in SWBT's CRIS database. The address on the customer's service record (CSR) is also taken from SWBT's CRIS database; the CSR is made available the CLEC via SWBT's pre-ordering interfaces. If the CLEC does not populate the LSR with the service address information provided by SWBT via the CSR, but instead relies on its own customer care database or some other source of information, the service address provided by the CLEC on its LSR may be incorrect.

7. The following are potential scenarios for D and C orders on a UNE-P migration:

- If the service address provided by the CLEC on the LSR is valid and matches the service address contained on the SWBT CSR for the end-user, the address on the D and C service orders will be the same. These service orders will remain related by the RRSO FID (so that they are worked in sync), and the D order facilities will be reused for the C order.
- If the service address provided by the CLEC on the LSR is an invalid address, the LSR will be automatically rejected back to the CLEC for correction
- If the service address provided by the CLEC on the LSR is a valid address, but is different from the service address contained on the SWBT CSR for the end-user, the C and D orders will have different addresses. Because the facilities reflected on the D order cannot be reused at the new address specified on the C order, the RRSO FID will be overridden, and the two service orders will flow through all provisioning systems as independent service orders. The C order appears to the systems as new service picking up new assignments, and D will flow on Due Date and disconnect the old service. As the Texas PUC supervised reconciliation of SWBT/AT&T trouble information demonstrates, when the service address is correctly populated by the CLEC using service address information provided by SWBT on the CSR, service disruptions resulting from the disassociation of the C and D order are very rare.
- If the service address provided by the CLEC on the LSR is the same as the service address on the CSR, but the location field ("LOC" for Location – Building, Apartment or Suite) is either different, or not provided on the LSR, both the C and D orders will go into edit conditions, prompting the LSC operations personnel to provide an electronic jeopardy status to the originating CLEC for final disposition.